



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901

October 27, 2020

Robert Reider, Interim Director  
San Diego Air Pollution Control District  
10124 Old Grove Road  
San Diego, California 92131-1640

Dear Director Reider:

Thank you for your submission of the San Diego Air Pollution Control District (SDAPCD) *2019 Annual Air Quality Monitoring Network Plan* on June 30, 2020. We have reviewed the submitted document based on the requirements set forth in 40 CFR Part 58. Based on the information provided in the plan, the U.S. Environmental Protection Agency (EPA) approves all portions of the network plan except those specifically identified below. With this plan approval, per 40 CFR part 58 Appendix D, §4.8.2(e), we also formally approve the PAMS meteorological waiver request for operating the required ceilometer at a location other than the El Cajon-Lexington Elementary School (AQS ID: 06-073-1022) NCore/PAMS site. The ceilometer will be located at the Escondido site (AQS ID: 06-073-1002) and data will be collected in a manner consistent with EPA quality assurance requirements for these measurements, as required for waiver approval.

Please note that we cannot approve portions of the annual network plan for which the information in the plan is insufficient to judge whether the requirement has been met, or for which the information provided does not meet the requirements as specified in 40 CFR 58.10 and the associated appendices. EPA Region 9 also cannot approve portions of the plan for which the EPA Administrator has not delegated approval authority to the regional offices. Enclosure A (*A. Annual Monitoring Network Plan Checklist*) is the checklist EPA used to review your plan for items that are required to be included in the annual network plan along with our assessment of whether the plan submitted by your agency addresses those requirements. Items highlighted in yellow are those EPA Region 9 is not acting on, as we either lack the authority to approve the specific item, or we have determined that a requirement is either not met or information in the plan is insufficient to judge whether the requirement has been met. Items highlighted in green in enclosure A require attention in order to improve next year's plan.

We also want to thank you for your timely submission of the *2020 5-Year Air Quality Monitoring Network Assessment* for SDAPCD, as required under 40 CFR Part 58.10. We recognize that preparing the network assessment was a significant project and we appreciate your effort.

All comments conveyed via this letter and enclosure should be addressed prior to submittal of next year's annual monitoring network plan to EPA.

If you have any questions regarding this letter or the enclosed comments, please feel free to contact me at (415) 947-4134 or Anna Mebust at (415) 972-3265.

Sincerely,

Gwen Yoshimura, Manager  
Air Quality Analysis Office

Enclosure:

A. Annual Monitoring Network Plan Checklist

cc (via email): David Medina, SDAPCD  
David Craig, SDAPCD  
Jin Xu, California Air Resources Board (CARB)  
Kathy Gill, CARB  
Michael Miguel, CARB  
Michael Werst, CARB  
Sylvia Vanderspek, CARB  
Webster Tasat, CARB

## A. ANNUAL MONITORING NETWORK PLAN CHECKLIST

(Updated April 8, 2020)

Year: 2020

Agency: San Diego Air Pollution Control District (SDAPCD)

40 CFR 58.10(a)(1) requires that each Annual Network Plan (ANP) shall provide for the documentation of the establishment and maintenance of an air quality surveillance system that consists of a network of SLAMS monitoring stations that can include FRM, FEM, and ARM monitors that are part of SLAMS, NCore, CSN, PAMS, and SPM stations.

40 CFR 58.10(a)(1) further directs that, “The plan shall include a statement of whether the operation of each monitor meets the requirements of appendices A, B, C, D, and E of this part, where applicable. The Regional Administrator may require additional information in support of this statement.” On this basis, review of the ANPs is based on the requirements listed in 58.10 along with those in Appendices A, C, D, and E.

EPA Region 9 will not take action to approve or disapprove any item for which Part 58 grants approval authority to the Administrator rather than the Regional Administrators, but we will do a check to see if the required information is included and correct. The items requiring approval by the Administrator are: NCore, and Speciation (STN/CSN).

Please note that this checklist summarizes many of the requirements of 40 CFR Part 58, but does not substitute for those requirements, nor do its contents provide a binding determination of compliance with those requirements. The checklist is subject to revision in the future and we welcome comments on its contents and structure.

Key:

White	meets the requirement
Yellow	requirement is not met, or information is insufficient to make a determination. Action requested in next year’s plan or outside the ANP process.
Green	item requires attention in order to improve next year’s plan.

	ANP requirement	Citation within 40 CFR 58 <sup>1</sup>	Was the information submitted? <sup>2</sup> If yes, section or page #s.	Does the information provided <sup>3</sup> meet the requirement? <sup>4</sup>	Notes
<b>GENERAL PLAN REQUIREMENTS</b>					
1.	Submit plan by July 1 <sup>st</sup>	58.10 (a)(1)	Y, email, cover page	Y	Submitted June 30, 2020.
2.	30-day public comment / inspection period	58.10 (a)(1); 58.10 (c)	Y, p.16	Y	
3.	Statement of whether the operation of each monitor meets the requirements of appendices A, B, C, D, and E, where applicable	58.10 (a)(1)	Y, p. 32-34	Y	
4.	Modifications to SLAMS network – case when we are not approving system modifications	58.10 (a)(2); 58.10 (b)(5); 58.10 (e); 58.14	Y, p. 35-36	Y	<p>The plan includes information on several potential and anticipated network changes, but does not include formal requests for EPA’s approval and does not provide sufficient information for EPA to review. Please continue to work closely with EPA to ensure that planned and ongoing system modifications meet requirements and are ultimately submitted to EPA for approval.</p> <p>At this time, EPA is not approving the previously-requested discontinuation of Pb monitoring at Palomar Airport, but EPA R9 will continue to work with OAQPS and OTAQ to determine discontinuation eligibility.</p>
5.	Modifications to SLAMS network – case when we are approving system modifications per 58.14	58.10 (a)(2); 58.10 (b)(5); 58.10 (e); 58.14	Y, p. 36	Y	EPA is approving the request for a waiver to operate the ceilometer required for PAMS at the Escondido site, rather than the Lexington Elementary School site. See the ANP response letter for more information about this approval.
6.	Does plan include documentation (e.g., attached		NA	NA	

<sup>1</sup> Unless otherwise noted.

<sup>2</sup> Response options: NA (Not Applicable), Yes, No, or Incomplete.

<sup>3</sup> Assuming the information is correct.

<sup>4</sup> Response options: NA (Not Applicable) – [reason], Yes, No, Insufficient to Judge, or Incorrect

	<b>ANP requirement</b>	<b>Citation within 40 CFR 58<sup>1</sup></b>	<b>Was the information submitted?<sup>2</sup> If yes, section or page #s.</b>	<b>Does the information provided<sup>3</sup> meet the requirement?<sup>4</sup></b>	<b>Notes</b>
	approval letter) for system modifications that have been approved since last ANP approval?				
7.	Any proposals to remove or move a monitoring station within a period of 18 months following plan submittal	58.10 (b)(5)	Y, p.35	Y	Please continue to work with EPA on any upcoming and unapproved shutdowns and relocations.
8.	Precision/Accuracy reports submitted to AQS	58.16 (a)	Y, p.34	Y, no changes noted	
9.	Annual data certification submitted	58.15	Y, p.34	Y, no changes noted	
10.	Statement that SPMs operating an FRM/FEM/ARM that meet Appendix E also meet either Appendix A or an approved alternative. Documentation for any Appendix A approved alternative should be included. <sup>5</sup>	58.11 (a)(2)	NA	NA	
11.	SPMs operating FRM/FEM/ARM monitors for over 24 months are listed as comparable to the NAAQS or the agency provided documentation that requirements from Appendices A, C, or E were not met. <sup>6</sup>	58.20 (c)	NA	NA	
12.	For agencies that share monitoring responsibilities in an MSA/CSA: this agency meets full monitoring requirements or an agreement between the affected agencies and the EPA Regional Administrator is in place	App D 2(e)	NA	NA	
<b>GENERAL PARTICULATE MONITORING REQUIREMENTS (PM<sub>10</sub>, PM<sub>2.5</sub>, Pb-TSP, Pb-PM<sub>10</sub>)</b>					
13.	Designation of a primary monitor if there is more than one monitor for a pollutant at a site.	App. A 3.2.3	Y, tables in App B-J	Y	Please note that Tables 6-2 and 8-2 list the primary Pb and PM <sub>10</sub> monitors at collocated sites as "Other." Please update these tables to reflect the primary monitors. Primary monitor information is contained in the site-specific tables.
14.	Distance between QA collocated monitors. For low volume PM instruments (flow rate < 200	App. A 3.2.3.4 (c) and 3.3.4.2 (c)	Y, tables in App B-J	Y	

<sup>5</sup> Alternatives to the requirements of appendix A may be approved for an SPM site as part of the approval of the annual monitoring plan, or separately.

<sup>6</sup> This requirement only applies to monitors that are eligible for comparison to the NAAQS per 40 CFR §§58.11(e) and 58.30.

	<b>ANP requirement</b>	<b>Citation within 40 CFR 58<sup>1</sup></b>	<b>Was the information submitted?<sup>2</sup> If yes, section or page #s.</b>	<b>Does the information provided<sup>3</sup> meet the requirement?<sup>4</sup></b>	<b>Notes</b>
	liters/minute) > 1 m. For high volume PM instruments (flow rate > 200 liters/minute) > 2m. [Note: waiver request or the date of previous waiver approval must be included if the distance deviates from requirement.]				

#### **PM<sub>2.5</sub> –SPECIFIC MONITORING REQUIREMENTS**

15.	Document how states and local agencies provide for the review of changes to a PM <sub>2.5</sub> monitoring network that impact the location of a violating PM <sub>2.5</sub> monitor.	58.10 (c)	Y, p.82	Y	
16.	Identification of any PM <sub>2.5</sub> FEMs and/or ARMs not eligible to be compared to the NAAQS due to poor comparability to FRM(s) [Note 1: must include required data assessment.] [Note 2: Required SLAMS must monitor PM <sub>2.5</sub> with <u>NAAQS-comparable</u> monitor at the required sample frequency.]	58.10 (b)(13) 58.11 (e)	Y, p.89	Y	
17.	Minimum # of monitoring <b>sites</b> for PM <sub>2.5</sub> [Note 1: should be supported by MSA ID, MSA population, DV, # monitoring sites, and # required monitoring sites] [Note 2: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App. D 4.7.1(a) and Table D-5	Y, p.81-89	Y	The ANP notes that an additional PM <sub>2.5</sub> FRM is needed to meet state requirements; however, the PM <sub>2.5</sub> FRM monitoring network meets EPA minimum monitoring requirements.
18.	Requirements for continuous PM <sub>2.5</sub> monitoring (number of monitors and collocation)	App. D 4.7.2	Y, p.86-88	Y	
19.	FRM/FEM/ARM PM <sub>2.5</sub> QA collocation	App. A 3.2.3	Y, p. 85	Y	
20.	PM <sub>2.5</sub> Chemical Speciation requirements for official STN sites	App. D 4.7.4	Y, p. 88	Y	Escondido speciation monitoring is temporarily closed; however, the Escondido site is not a required EPA STN site.
21.	Identification of sites suitable and sites not suitable for comparison to the annual PM <sub>2.5</sub> NAAQS as described in Part 58.30	58.10 (b)(7)	Y, p. 89	Y	
22.	Required PM <sub>2.5</sub> sites represent area-wide air quality	App. D 4.7.1(b)	Y, Table 7-2	Y	

	<b>ANP requirement</b>	<b>Citation within 40 CFR 58<sup>1</sup></b>	<b>Was the information submitted?<sup>2</sup> If yes, section or page #s.</b>	<b>Does the information provided<sup>3</sup> meet the requirement?<sup>4</sup></b>	<b>Notes</b>
23.	For PM <sub>2.5</sub> , within each MSA, at least one site at neighborhood or larger scale in an area of expected maximum concentration	App. D 4.7.1(b)(1)	Y, Table 7-7	Y	
24.	If additional SLAMS PM <sub>2.5</sub> is required, there is a site in an area of poor air quality	App. D 4.7.1(b)(3)	Y, Table 7-9	Y	
25.	States must have at least one PM <sub>2.5</sub> regional background and one PM <sub>2.5</sub> regional transport site.	App. D 4.7.3	NA	NA	
26.	Sampling schedule for PM <sub>2.5</sub> - applies to year-round and seasonal sampling schedules (note: date of waiver approval must be included if the sampling season deviates from requirement)	58.10 (b)(4); 58.12(d); App. D 4.7	Y, p.79	Y	
27.	Frequency of flow rate verification for automated and manual PM <sub>2.5</sub> monitors	App. A 3.2.1	Y, Appendices B-J	Y	
28.	Dates of two semi-annual flow rate audits conducted in <b>the previous CY</b> for PM <sub>2.5</sub> monitors [Note: 5 -7 month interval is recommended but not a requirement.]	App. A 3.2.2	Y, Appendices B-J	Y	Only one flow rate audit, in late December 2019, was reported for the FRM monitor at Rancho Carmel Drive. This monitor began operating in June 2019 and therefore the audit occurred within 5-7 months of the monitoring start date. Similarly, the non-FEM PM <sub>2.5</sub> monitor at Sherman Elementary began operating in August 2019 and only one flow rate audit, in December 2019, was reported.

#### **PM<sub>10</sub> –SPECIFIC MONITORING REQUIREMENTS**

29.	Minimum # of monitoring sites for PM <sub>10</sub> [Note: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App. D, 4.6 (a) and Table D-4	Y, p.101	Y	
30.	Manual PM <sub>10</sub> method collocation (note: continuous PM <sub>10</sub> does not have this requirement)	App. A 3.3.4	Y, p.101	Y	
31.	Sampling schedule for PM <sub>10</sub>	58.10 (b)(4); 58.12(e); App. D 4.6	Y, p. 102	Y	
32.	Frequency of flow rate verification for	App. A 3.3.1 and	Y, App D, E, G	Y	

	<b>ANP requirement</b>	<b>Citation within 40 CFR 58<sup>1</sup></b>	<b>Was the information submitted?<sup>2</sup> If yes, section or page #s.</b>	<b>Does the information provided<sup>3</sup> meet the requirement?<sup>4</sup></b>	<b>Notes</b>
	automated and manual PM <sub>10</sub> monitors	3.3.2			
33.	Dates of two semi-annual flow rate audits conducted in <b>the previous CY</b> for PM <sub>10</sub> monitors [Note: 5 -7 month interval is recommended but not a requirement.]	App. A 3.3.3	Y, App D, E, G	Y	

#### **Pb –SPECIFIC MONITORING REQUIREMENTS**

34.	Minimum # of monitors for non-NCore Pb [Note: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App D 4.5	Y, p.72-74	Y	
35.	Pb collocation: for non-NCore sites	App A 3.4.4 and 3.4.5	Y, p.74	Y	
36.	Any source-oriented Pb site for which a waiver has been granted by EPA Regional Administrator	58.10 (b)(10)	NA	NA	
37.	Any Pb monitor for which a waiver has been requested or granted by EPA Regional Administrator for use of Pb-PM <sub>10</sub> in lieu of Pb-TSP	58.10 (b)(11)	NA	NA	
38.	Designation of any Pb monitors as either source-oriented or non-source-oriented	58.10 (b)(9)	Y, Table 6-2	Y	
39.	Sampling schedule for Pb	58.10 (b)(4); 58.12(b); App A 3.4.4.2 (c) and 3.4.5.3 (c)	Y, p.71	Y	
40.	Frequency of flow rate verification for Pb monitors audit	App A 3.4.1 and 3.4.2	Y, p. 173	Y	
41.	Dates of two semi-annual flow rate audits conducted in <b>the previous CY</b> for Pb monitors [Note: 5 -7 month interval is recommended but not a requirement.]	App A 3.4.3	Y, p.173	Y	

#### **GENERAL GASEOUS MONITORING REQUIREMENTS**

42.	Frequency of one-point QC check (gaseous)	App. A 3.1.1	Y, App B-J	Y	
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	<b>ANP requirement</b>	<b>Citation within 40 CFR 58<sup>1</sup></b>	<b>Was the information submitted?<sup>2</sup> If yes, section or page #s.</b>	<b>Does the information provided<sup>3</sup> meet the requirement?<sup>4</sup></b>	<b>Notes</b>
43.	Date of Annual Performance Evaluation (gaseous) conducted in <b>the previous CY</b>	App. A 3.1.2	Y, App B-J	Y	

#### O<sub>3</sub> –SPECIFIC MONITORING REQUIREMENTS

44.	Minimum # of monitoring sites for O <sub>3</sub> [Note 1: should be supported by MSA ID, MSA population, DV, # monitoring sites, and # required monitoring sites] [Note 2: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.] [Note 3: monitors that do not meet traffic count/distance requirements to be neighborhood or urban scale (40 CFR Appendix E, Table E-1) cannot be counted towards meeting minimum monitoring requirements]	App D 4.1(a) and Table D-2	Y, p.40-42	Y	
45.	Identification of maximum concentration O <sub>3</sub> site(s)	App D 4.1 (b)	Y, p.41	Y	
46.	Sampling season for O <sub>3</sub> (Note: Waivers must be renewed annually. EPA expects agencies to submit re-evaluations of the relevant data each year with the ANP. EPA will then respond as part of the ANP response.)	58.10 (b)(4); App D 4.1(i)	Y, p.41	Y	
47.	An Enhanced Monitoring Plan for O <sub>3</sub> , if applicable, no later than October 1, 2019 or two years following the effective date of a designation to a classification of Moderate or above O <sub>3</sub> nonattainment, whichever is later.	58.10 (a)(11); App D 5 (h)	NA	NA	

#### NO<sub>2</sub> –SPECIFIC MONITORING REQUIREMENTS

48.	Minimum monitoring requirements for area-wide NO <sub>2</sub> monitor in location of expected highest NO <sub>2</sub> concentrations representing neighborhood or larger scale	App D 4.3.3	Y, p.52	Y	
49.	Minimum monitoring requirements for susceptible and vulnerable populations	App D 4.3.4	Y, p.52-53	Y	SDAPCD has identified the Sherman Elementary site as a replacement RA40

	<b>ANP requirement</b>	<b>Citation within 40 CFR 58<sup>1</sup></b>	<b>Was the information submitted?<sup>2</sup> If yes, section or page #s.</b>	<b>Does the information provided<sup>3</sup> meet the requirement?<sup>4</sup></b>	<b>Notes</b>
	monitoring (aka RA40) NO <sub>2</sub>				monitor. EPA R9 will consult with OAQPS on this monitor designation.
50.	Identification of required NO <sub>2</sub> monitors as either near-road, area-wide, or vulnerable and susceptible population (aka RA40)	58.10 (b)(12)	Y, Appendices B-J	Y	

#### NEAR ROADWAY – SPECIFIC MONITORING REQUIREMENTS

In CBSAs  $\geq 2.5$  million, the following near-roadway minimum monitoring requirements apply:

51.	Two NO <sub>2</sub> monitors	App. D 4.3.2(a); 58.13(c)(3) and (4)	Y, p.48-51	N	The second near-road NO <sub>2</sub> monitoring site is under construction at San Ysidro and anticipated to be operational in early 2021. This monitoring site was reviewed and approved by EPA in the previous year's ANP response.
52.	One CO monitor	App. D 4.2.1(a); 58.13(e)(2)	Y, p. 60	Y	
53.	One PM <sub>2.5</sub> monitor	App. D 4.7.1(b)(2); 58.13(f)(2)	Y, p. 83	Y	

In CBSAs  $\geq 1$  million and AADT  $\geq 250K$ , the following near-roadway minimum monitoring requirements apply:

54.	Two NO <sub>2</sub> monitors	App. D 4.3.2(a); 58.13(c)(3) and (4)	NA	NA	
55.	One CO monitor	App. D 4.2.1(a); 58.13(e)(2)	NA	NA	
56.	One PM <sub>2.5</sub> monitor	App. D 4.7.1(b)(2); 58.13(f)(2)	NA	NA	

In CBSAs  $\geq 1$  million and  $\leq 2.5$  million **AND** AADT  $< 250K$ , the following near-roadway minimum monitoring requirements apply:

57.	One NO <sub>2</sub> monitor	App. D 4.3.2(a); 58.13(c)(3)	NA	NA	
58.	One CO monitor	App. D 4.2.1(a); 58.13(e)(2)	NA	NA	
59.	One PM <sub>2.5</sub> monitor	App. D	NA	NA	

	<b>ANP requirement</b>	<b>Citation within 40 CFR 58<sup>1</sup></b>	<b>Was the information submitted?<sup>2</sup> If yes, section or page #s.</b>	<b>Does the information provided<sup>3</sup> meet the requirement?<sup>4</sup></b>	<b>Notes</b>
		4.7.1(b)(2); 58.13(f)(2)			

#### **SO<sub>2</sub> –SPECIFIC MONITORING REQUIREMENTS**

60.	Minimum monitoring requirements for SO <sub>2</sub> based on PWEI and/or RA required monitors under Appendix D 4.4.3 [Note: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App D 4.4	Y, p. 66-67	Y	
61.	Monitors used to meet Data Requirements Rule	51.1203(c)	NA	NA	

#### **NCORE –SPECIFIC MONITORING REQUIREMENTS**

62.	NCore site and all required parameters operational: year-round O <sub>3</sub> , SO <sub>2</sub> , CO, NO <sub>y</sub> , NO, PM <sub>2.5</sub> mass, PM <sub>2.5</sub> continuous, PM <sub>2.5</sub> speciation, PM <sub>10-2.5</sub> mass, resultant wind speed at 10m, resultant wind direction at 10m, ambient temperature, relative humidity. NO <sub>y</sub> waiver, if applicable.	App. D 3(b)	Y, p. 107	Y	
63.	A plan for making Photochemical Assessment Monitoring Stations (PAMS) measurements, if applicable. The plan shall provide for the required PAMS measurements to begin by June 1, 2021.	58.10 (a)(10); 58.13 (h)	Y, p.110-115	Y	Note: EPA is approving SDAPCD's request for a waiver to operate the ceilometer at the Escondido site rather than the Lexington Elementary School NCore/PAMS site.

#### **SITE OR MONITOR - SPECIFIC REQUIREMENTS (OFTEN INCLUDED IN DETAILED SITE INFORMATION TABLES)**

64.	AQS site identification number for each site	58.10 (b)(1)	Y, throughout	Y	
65.	Location of each site: street address and geographic coordinates	58.10 (b)(2)	Y, no changes noted	Y, no changes noted	
66.	MSA, CBSA, CSA or other area represented by the monitor	58.10 (b)(8)	Y, no changes noted	Y, no changes noted	
67.	Parameter occurrence code for each monitor	Needed to	Y, no changes noted	Y, no changes noted	

	<b>ANP requirement</b>	<b>Citation within 40 CFR 58<sup>1</sup></b>	<b>Was the information submitted?<sup>2</sup> If yes, section or page #s.</b>	<b>Does the information provided<sup>3</sup> meet the requirement?<sup>4</sup></b>	<b>Notes</b>
		determine if other requirements (e.g., min # and collocation) are met			
68.	Basic monitoring objective for each monitor	App D 1.1; 58.10 (b)(6)	Y, no changes noted	Y, no changes noted	
69.	Site type for each monitor	App D 1.1.1	Y, no changes noted	Y, no changes noted	
70.	Monitor type for each monitor, and Network Affiliation(s) as appropriate	Needed to determine if other requirements (e.g., min # and collocation) are met	Y, no changes noted	Y, no changes noted	
71.	Scale of representativeness for each monitor as defined in Appendix D	58.10(b)(6); App D	Y, no changes noted	Y, no changes noted	
72.	Parameter code for each monitor	Needed to determine if other requirements (e.g., min # and collocation) are met	Y, no changes noted	Y, no changes noted	
73.	Method code and description (e.g., manufacturer & model) for each monitor	58.10 (b)(3); App C 2.4.1.2	Y, no changes noted	Y, no changes noted	
74.	Sampling start date for each monitor	Needed to determine if other requirements (e.g., min # and collocation) are met	Y, no changes noted	Y, no changes noted	
75.	Distance of monitor from nearest road	App E 6	Y, no changes noted	Y, no changes noted	
76.	Traffic count of nearest road	App E	Y, no changes noted	Y, no changes noted	
77.	Groundcover	App E 3(a)	Y, no changes noted	Y, no changes noted	
78.	Probe height	App E 2	Y, no changes noted	Y, no changes noted	
79.	Distance from supporting structure (vertical and	App E 2	Yes, Appendices	Y	

	<b>ANP requirement</b>	<b>Citation within 40 CFR 58<sup>1</sup></b>	<b>Was the information submitted?<sup>2</sup> If yes, section or page #s.</b>	<b>Does the information provided<sup>3</sup> meet the requirement?<sup>4</sup></b>	<b>Notes</b>
	horizontal, if applicable, should be provided)				
80.	Distance from obstructions on roof (horizontal distance to the obstruction and vertical height of the obstruction above the probe should be provided)	App E 4(b)	Y, no changes noted	Y, no changes noted	
81.	Distance from obstructions not on roof (horizontal distance to the obstruction and vertical height of the obstruction above the probe should be provided)	App E 4(a)	Y, no changes noted	Y, no changes noted	
82.	Distance from the drip line of closest tree(s)	App E 5	Y, no changes noted	Y, no changes noted	
83.	Distance to furnace or incinerator flue	App E 3(b)	Y, no changes noted	Y, no changes noted	
84.	Unrestricted airflow (expressed as degrees around probe/inlet or percentage of monitoring path)	App E, 4(a) and 4(b)	Y, no changes noted	Y, no changes noted	
85.	Probe material (NO/NO <sub>2</sub> /NO <sub>y</sub> , SO <sub>2</sub> , O <sub>3</sub> ; For PAMS: VOCs, Carbonyls)	App E 9	Y, no changes noted	Y, no changes noted	
86.	Residence time (NO/NO <sub>2</sub> /NO <sub>y</sub> , SO <sub>2</sub> , O <sub>3</sub> ; For PAMS: VOCs, Carbonyls)	App E 9	Y, no changes noted	Y, no changes noted	

**Public Comments on Annual Network Plan**

Were comments submitted to the S/L/T agency during the public comment period?	<b>No</b>
Were comments included in ANP submittal?	<b>NA</b>
Were any of the comments substantive? If yes, which ones? If comments were not substantive provide rationale.	<b>NA</b>
Were S/L/T responses to substantive comments included in ANP submittal?	<b>NA</b>
Were the S/L/T responses to substantive comments adequate?	<b>NA</b>
Do the substantive comments require separate EPA response (i.e., agency response wasn't adequate)?	<b>NA</b>
Are the sections of the annual network plan that received substantive comments approvable after consideration of comments? If yes, provide rationale	<b>NA</b>